

UNPROCESSED

FEDERAL EXPRESS

February 15, 2011

Document Processing Desk (DCI/PRD)  
Russell Wasem, Chemical Review Manager  
Pesticide Re-evaluation Division (7508P)  
U.S. Environmental Protection Agency  
2775 South Crystal Drive  
Washington, D.C. 20460



Dear Mr. Wasem;

**Re: Imidacloprid Technical Data Call-In: 90-Day Response  
Sharda Worldwide Exports Pvt. Ltd.**

In compliance with the EPA Generic Data Call-In Notice, received on November 15, 2010, Wagner Regulatory Associates, on behalf of Sharda Worldwide Exports Pvt. Ltd., is submitting the enclosed 90-day response for Imidacloprid Technical.

This response includes the following:

- A letter authorizing Wagner Regulatory Associates, Inc. to serve as Agent on behalf of Sharda Worldwide Exports Pvt. Ltd.
- GDCI Notice
- GDCI Response Form
- Requirements Status and Registrant's Form
- Two (2) copies of the Confidential Statement of Formula (8570-4) *Destroyed*
- Certification with Respect to Citation of Data form (8570-31)
- Certification of Offer to Cost Share in the Development of Data form (8570-32)
- Copy of twelve (12) Offer to Cost Share letters

If you have any questions regarding this response please contact the undersigned.

Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports

Enclosures

Sharda.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF  
CHEMICAL SAFETY AND  
POLLUTION PREVENTION

NOV 10 2010

November 9, 2010

Subject: Imidacloprid Registration Review Data Call-in (DCI)

Dear Imidacloprid Technical Registrant,

When the EPA issued the registration review DCI for imidacloprid (RR-129099-29813), one data requirement was accidentally omitted. Specifically, the aerobic aquatic metabolism study (GLN 835.4300) should have been included in the original DCI. Please find enclosed a new imidacloprid registration review DCI (RR-129099-30160) that supersedes the previous imidacloprid registration review DCI (RR-129099-29813). Registrants are only responsible for responding to the new imidacloprid registration review DCI (RR-129099-30160) within 90 days of receipt.

If you have any further questions regarding rodenticide reregistration, please contact Rusty Wasem of my staff at 703-305-6979 or [wasem.russell@epa.gov](mailto:wasem.russell@epa.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Neil Anderson".

Neil Anderson, Chief RMIB 1  
Pesticide Re-Evaluation Division



United States Environmental Protection  
Agency Washington, D.C. 20460  
**DATA CALL-IN RESPONSE**

OMB Approval 2070-0174

OMB Approval 2070-0107  
OMB Approval 2070-0057

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address SHARDA WORLDWIDE EXPORTS PVT. LTD. 7460 LANCASTER PIKE, SUITE 9 HOCKESSIN, DE 197070640		2. Case # and Name  Chemical # and Name 129099 Imidacloprid		3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160	
4. EPA Product Registration	5. I wish to cancel this product registration voluntarily	6. Generic Data		7. Product Specific Data	
		6a. I am claiming a Generic Data Exemption because I obtain the active ingredient from the source EPA registration number listed below.	6b. I agree to satisfy Generic Data requirements as indicated on the attached form entitled "Requirements Status and Registrant's Response."	7a. My product is an MUP and I agree to satisfy the MUP requirements on the attached form entitled "Requirements Status and Registrant's Response."	7b. My product is an EUP and I agree to satisfy the EUP requirements on the attached form entitled "Requirements Status and Registrant's Response."
82633-8			X	N.A.	N.A.
8. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <u>Louie Zeller</u>				9. Date February 15, 2011	
10. Name of Company Sharda Worldwide Exports Pvt. Ltd.				11. Phone Number 302-234-0991	



United States Environmental Protection  
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107  
OMB Approval 2070-0057

# REQUIREMENTS STATUS AND REGISTRANT'S RESPONSE

INSTRUCTIONS: Please type or print in ink. Please read carefully the attached instructions and supply the information requested on this form.  
Use additional sheet(s) if necessary.

1. Company Name and Address SHARDA WORLDWIDE EXPORTS PVT. LTD. 7460 LANCASTER PIKE, SUITE 9 HOCKESSIN, DE 197070640		2. Case # and Name  Chemical # and Name 129099 Imidacloprid			3. Date and Type of DCI and Number 10-Nov-2010 GENERIC ID # RR-129099-30160.				
4. Guideline Requirement Number	5. Study Title	P R O T O C O L	Progress Reports			6. Use Pattern	7. Test Substance	8. Time Frame (Months)	9. Registrant Response
			1	2	3				
835.4300	<u>Environmental Fate Data Requirements (Conventional Chemical)</u> Aerobic aquatic metabolism					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI or PAIRA	24	2
850.4100	<u>Nontarget Plant Protection Data Requirements (Conventional Chemical)</u> Terrestrial plant toxicity, Tier 1 (seeding emergence) (5, 10)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	2
850.4150	Terrestrial plant toxicity, Tier 1 (vegetative vigor) (3, 11, 12)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	2
850.4400	Aquatic plant toxicity test using Lemna spp. Tiers I and II (4)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP or TGAI	12	2
875.2300	<u>Post-Application Exposure Data Requirements (Conventional Chemical)</u> Indoor surface residue dissipation (1, 13, 14)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	2
850.3040	<u>Terrestrial and Aquatic Nontarget Organisms Data Requirements (Conventional Chemical)</u> Field testing for pollinators (2, 15)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	24	2
870.7800	<u>Toxicology Data Requirements (Conventional Chemical)</u> Immunotoxicity					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TGAI	12	2
10. Certification I certify that the statements made on this form and all attachments are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine, imprisonment or both under applicable law. Signature and Title of Company's Authorized Representative <i>Lou Gehlert, Agent</i>							11. Date February 15, 2011		
12. Name of Company Sharda Worldwide Exports Pvt. Ltd.							13. Phone Number 302-234-0991		

United States Environmental Protection  
Agency Washington, D.C. 20460

OMB Approval 2070-0174

OMB Approval 2070-0107  
OMB Approval 2070-0057

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Use additional sheet(s) if necessary.

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			1	2	3				
Special Study	Residue Analysis of Nectar and Pollen in Flowering Crops (7,8,9,17)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	48	2
Special Study	Seed Leaching Study Using TEP (6,16)					H, R, U, BB, I, K, II, Q, A, B, C, J, T, S	TEP	12	2
<p>Initial to indicate certification as to information on this page (full text of certification is on page one).</p> <p style="text-align: right;"><i>LK</i></p>									
							Date February 15, 2011		



United States Environmental Protection Agency  
Washington, DC 20460



Form Approved  
OMB No. 2070-0107,  
2070-0057  
Approval Expires  
3-31-99

**CERTIFICATION WITH RESPECT TO  
DATA COMPENSATION REQUIREMENTS**

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to, Chief Information Policy Branch, PM-233, U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460; and to the Office of Management and Budget, Paperwork Reduction Project (2070-0106), Washington, DC 20503.

Please fill in blanks below.

Company Name

Sharda Worldwide Exports Pvt. Ltd.

Company Number

82633

Product Name

Imidacloprid Technical Insecticide

EPA Reg. No.

82633-8

I Certify that:

1. For each study cited in support of registration or reregistration under the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA) that is an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter to cite that study.

2. That for each study cited in support of registration or reregistration under FIFRA that is NOT an exclusive use study, I am the original data submitter, or I have obtained the written permission of the original data submitter, or I have notified in writing the company(ies) that submitted data I have cited and have offered to: (a) Pay compensation for those data in accordance with sections 3(c)(1)(F) and 3(c)(2)(D) of FIFRA; and (b) Commence negotiation to determine which data are subject to the compensation requirement of FIFRA and the amount of compensation due, if any. The companies I have notified are. (check one)

☐ The companies who have submitted the studies listed on the back of this form or attached sheets, or indicated on the attached "Requirements Status and Registrants' Response Form."

3. That I have previously complied with section 3(c)(1)(F) of FIFRA for the studies I have cited in support of registration or reregistration under FIFRA.

Signature

*Lori Kohler*

Date

February 15, 2011

Name and Title (Please Type or Print)

Lori Kohler, Agent

**GENERAL OFFER TO PAY:** I hereby offer and agree to pay compensation to other persons, with regard to the registration or reregistration of my products, to the extent required by FIFRA section 3(c)(1)(F) and 3(c)(2)(D).

Signature

*Lori Kohler*

Date

February 15, 2011

Name and Title (Please Type or Print)

Lori Kohler, Agent



United States Environmental Protection Agency  
Washington, D.C. 20460  
CERTIFICATION OF ATTEMPT TO ENTER INTO AN  
AGREEMENT WITH REGISTRANTS FOR  
DEVELOPMENT OF DATA

Form Approved.

OMB Nos. 2070-0057;  
2070-0107; 2070-0122;  
2070-0164

**Paperwork Reduction Act Notice:** The public reporting burden for this collection of information is estimated to average 15 minutes per response including time for reviewing the instructions, searching existing data sources, gathering and maintaining the data needed and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the form to this address.

Please fill in blanks below

Company Name

Sharda Worldwide Exports Pvt. Ltd.

Company Number

82633

Chemical Name

Imidacloprid

EPA Chemical Number

129099

I Certify that:

My company is willing to develop and submit the data required by EPA under the authority of the Federal Insecticide, Rodenticide and Fungicide Act (FIFRA), if necessary. However, my company would prefer to enter into an agreement with one or more registrants to develop jointly or share in the cost of developing data.

My firm has offered in writing to enter into such an agreement. That offer was irrevocable and included an offer to be bound by arbitration under section 3(c)(2)(B)(iii) of FIFRA if final agreement on all terms could not be reached otherwise. This offer was made to the following firm(s) on the following date(s):

Name of Firm(s)

Bayer Environ Science  
Lanxess Corporation  
Celsius Property B.V.  
United Phosphorus  
Hebei Veyong Bio-Chem

Nufarm Americas  
Bayer CropScience  
Nufarm  
Advan  
Amtide

Albaugh  
Control Solutions  
Rotam Ltd.  
Source Dynamics  
Ensystex III

Date of Offer

February 15, 2011

Certification:

I certify that I am duly authorized to represent the company name above, and that the statements that I have made on this form and all attachments therein are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature of Company's Authorized Representative

Date

February 15, 2011

Name and Title (Please Print or Type)

Lori Kohler, Agent for Sharda Worldwide Exports, Pvt. Ltd.





Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

Lanxess Corporation  
111 Ridc Park West Drive  
Pittsburgh, PA 15275-1112

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

In the EPA Generic Data Call-In Notice (DCI) of November 10, 2010 for Imidacloprid, your company is included in the list of registrants receiving the DCI. In connection with this DCI, Sharda Worldwide Exports Pvt. Ltd. (Sharda) is interested in sharing the cost of data development.

Therefore, in accordance with Section 3(c)(2)(B) of the Federal Insecticide, Fungicide and Rodenticide Act, Sharda hereby offers to share in the cost of development of the data specified in the referenced DCI.

In your return correspondence, please indicate if your company is willing to share the cost of developing the above data with Sharda.

Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.





Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

Celsius Property B.V., Amsterdam (NL)  
c/o Mana, Inc  
4515 Falls of Neuse Rd.  
Suite 300  
Raleigh, NC 27609

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

United Phosphorus, Inc  
630 Freedom Business Center  
Suite 402  
King of Prussia, PA 19406

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

Nufarm Inc.  
Nufarm Americas, Inc.  
150 Harvester Drive  
Suite 200  
Burr Ridge, IL 60527

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.





Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

Advan LLC  
2520 Meridian Pkwy.  
Suite 525  
Durham, NC 27713

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

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Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECIEPT REQUESTED

February 15, 2011

Amtide LLC  
21 Hubble  
Irvine, CA 92618

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

Albaugh Inc  
1525 NE 36<sup>th</sup> Street  
Ankeny, IA 50021

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.





Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECIEPT REQUESTED

February 15, 2011

Control Solutions, Inc.  
c/o D. O'Shaughnessy Consulting, Inc.  
427 Hide Away Circle  
Cub Run, KY 42729

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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Sincerely,

Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.



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P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

Rotam Limited  
c/o IPM Resources LLC  
4032 Crockers Lake Blvd.  
Suite 818  
Sarasota, FL 33238

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

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Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.



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P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECEIPT REQUESTED

February 15, 2011

Source Dynamics, LLC  
10039 E. Troon North Drive  
Scottsdale, AZ 85262

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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Agent for Sharda Worldwide Exports Pvt. Ltd.





Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECIEPT REQUESTED

February 15, 2011

Ensysyex III, Inc.  
c/o Pyxis Regulatory Consulting, Inc.  
4110 136<sup>th</sup> St. NW  
Gig Harbor, WA 98332

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

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Lori Kohler  
Agent for Sharda Worldwide Exports Pvt. Ltd.



Wagner Regulatory Associates, Inc.  
P.O. Box 640  
7460 Lancaster Pike, Suite 9  
Hockessin, Delaware 19707

CERTIFIED MAIL- RETURN RECIEPT REQUESTED

February 15, 2011

Bayer Environmental Science  
Bayer CropScience LP  
P.O. Box 12014  
2 T.W. Alexander Drive  
Research Triangle Park, NC 27709

Subject: Generic Data Call-in/Offer to Cost Share  
Imidacloprid (RR-129099-30160)

Dear Sir Madam:

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